

1 Michael J. Gearin, WSBA # 20982
David C. Neu, WSBA # 33143
2 Brian T. Peterson, WSBA # 42088
K&L GATES LLP
3 925 Fourth Avenue, Suite 2900
Seattle, WA 98104-1158
4 (206) 623-7580

Honorable Christopher M. Alston
Chapter 11
Ex Parte

5
6
7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 In re:

Case No. 16-11767-CMA

10 NORTHWEST TERRITORIAL MINT, LLC,
11
12 Debtor.

EX PARTE MOTION TO SHORTEN TIME
ON MOTION FOR ORDER
AUTHORIZING THE AUCTION AND
SALE OF THE DEBTOR'S EQUIPMENT,
DIES, TOOLING, ARCHIVES, AND
INVENTORY FREE AND CLEAR OF
ALL LIENS, CLAIMS, INTERESTS, AND
ENCUMBRANCES

15 Mark Calvert, the Chapter 11 Trustee (the "Trustee"), moves the Court for an order
16 shortening time for a hearing on the Chapter 11 Trustee's Motion for Order Authorizing the Auction
17 and Sale of the Debtor's Equipment, Dies, Tooling, Archives, and Inventory Free and Clear of Liens,
18 Claims, Interests, and Encumbrances (the "Auction Motion").

19 The Trustee has worked for more than 20 months to reorganize the business of the Northwest
20 Territorial Mint, LLC ("NWTM" or the "Debtor") and preserve its value as a going concern.
21 Unfortunately, the business has not been profitable since the Spring of 2017 and the Trustee has run
22 out of cash to continue to operate the business. The Trustee closed the business on December 29,
23 2017 after working for many months to sell the business as a going concern. The Trustee now needs
24 to liquidate the physical assets of the bankruptcy estate, worth several million dollars, and eliminate
25

26 *EX PARTE* MOTION TO SHORTEN TIME ON MOTION
FOR ORDER AUTHORIZING THE AUCTION AND
SALE OF THE DEBTOR'S EQUIPMENT, DIES,
TOOLING, ARCHIVES, AND INVENTORY FREE AND
CLEAR OF ALL LIENS, CLAIMS, INTERESTS, AND
ENCUMBRANCES

500988665 v2

K&L GATES LLP
925 FOURTH AVENUE
SUITE 2900
SEATTLE, WASHINGTON 98104-1158
TELEPHONE: (206) 623-7580
FACSIMILE: (206) 623-7022

1 overhead expenses including salaries and occupancy costs necessary to accomplish the liquidation.
2 The Trustee believes the most effective and beneficial way to accomplish this goal is to conduct a
3 public auction of the assets using James G. Murphy Inc. ("Murphy") as auctioneer. Murphy has
4 been previously appointed by the Court as auctioneer.

5 Cause exists to shorten time on the Auction Motion. Given the liquidity concerns facing the
6 Debtor's business and the necessity that this auction be conducted as quickly as possible, Court
7 approval of the Auction Motion on shortened time will permit the Trustee to quickly conduct the
8 auction and eliminate overhead expenses. In particular, the sooner the Trustee can conduct the
9 auction, the sooner he will be able to vacate the Debtor's Dayton premises.

10 Based on the foregoing, the Trustee respectfully requests that the Court grant this *ex parte*
11 motion and shorten the time for hearing on the Auction Motion to January 26, 2018 at 9:30 a.m.

12 The Trustee further requests that any response to the Auction Motion be due on Thursday,
13 January 25, 2018 by 5:00 p.m. PST.

14 Based on the foregoing, the Trustee respectfully requests that this Court grant this *ex parte*
15 motion to shorten time for a hearing on the Auction Motion and enter the Trustee's accompanying
16 proposed order.

17
18 DATED this 19th day of January, 2018

19 K&L GATES LLP

20
21 By /s/ Michael J. Gearin

22 Michael J. Gearin, WSBA #20982

23 David C. Neu, WSBA #33143

24 Brian T. Peterson, WSBA #42088

25 Attorneys for Mark Calvert, Chapter 11 Trustee

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1 **CERTIFICATE OF SERVICE**

2 The undersigned declares as follows:

3 That she is a Paralegal in the law firm of K&L Gates LLP, and on January 19, 2018, she
4 caused the foregoing document to be filed electronically through the CM/ECF system which caused
5 Registered Participants to be served by electronic means, as fully reflected on the Notice of
6 Electronic Filing.

7 Also on January 19, 2018, she caused the foregoing document to be deposited in the U.S.
8 mail to the Party at the address listed below:

9 Northwest Territorial Mint LLC
10 c/o Ross Hansen, Member
11 P.O. Box 2148
12 Auburn, WA 98071-2148

13 I declare under penalty of perjury under the laws of the State of Washington and the United
14 States that the foregoing is true and correct.

15 Executed on the 19th day of January, 2018 at Seattle, Washington.

16 /s/ Denise A. Lentz
17 Denise A. Lentz
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26 EX PARTE MOTION TO SHORTEN TIME ON MOTION
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